From: <u>JOHNSON Keith</u>

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Cc: ANDERSON Jim M; voster@anchorenv.com; MCCLINCY Matt

**Subject:** RE: Updated Stormwater Table

**Date:** 12/04/2006 05:11 PM

I missed some observations that were made at the end of the meeting Thursday speculating on DEQ's plans and commitments to addressing additional sampling of stormwater (loading sampling) through our SC process at non-LWG sites. As I have indicated in the past, we are in the midst of stormwater characterization sampling this year, and our efforts for loading evaluations this water year consist of direction supplied to the City via our Outfalls IGA.

The question I want to address is: Will DEQ be requiring high priority stormwater sites (as identified on the attached list, and potentially others) to collect contaminant loading data (e.g., whole water composite samples and/or sediment traps)?

The answer to this question is "maybe", because the premise is important.

The premise for the sampling proposals currently under discussion and the subsequent list that has been generated is to create a body of information necessary to inform the completion of the RI/FS.

The premise that would underlie DEQ's requirement for a site to collect loading data would be whether or not that information is necessary to make a source control determination. We are currently making those kinds of decisions by comparing screening data (whole water and sediment/catch basin grab samples) to JSCS screening level values. Our decision criteria will evolve as more precise information on the impacts of stormwater becomes available through the Round 2 report and in-water RI/FS and we are better able to evaluate the relative importance of each stormwater discharge into the harbor.

With respect to the sampling proposals currently under discussion, the bottom line is this - at this time, DEQ is not making a commitment to require the non-LWG sites to collect the same stormwater data (composite samples and sediment traps) as the LWG sites. Those site specific decisions will be made after source control has been implemented at sites and will be shaped in part by information coming out of the Round 2 report, modelling work, and RI/FS efforts.

It is our intention to develop those decision criteria, and guidelines for implementation, in time for next water year. The work that is being done now to identify sampling methodologies and techniques will provide the standards for those future investigations.

## Keith

----Original Message---From: McKenna, James (Jim) [mailto:Jim.McKenna@portofportland.com]
Sent: Friday, December 01, 2006 4:41 PM
To: Blischke.Eric@epamail.epa.gov; Anderson, Nicole; ricka@bes.ci.portland.or.us;
aron.borok@EILTD.net; HOPE Bruce; Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov;
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TARNOW Karen E; rjw@nwnatural.com; ROICK Tom; frederick.wolf@arkemagroup.com
Cc: ANDERSON Jim M; voster@anchorenv.com
Subject: RE: Updated Stormwater Table

Eric, attached please find a revised version with Port comments in red. Also, it appears you forgot WR-218 (UPRR Albina yard) which we agreed should be a "yes" under high priority sites. Also, OF-18 and OF-19 were identified by DEQ as high priority, so they should be elevated from the "DEQ JSCS Program" list to the "high priority list". Finally, since the purpose of this table is to identify outfalls that represent "specific land uses" and "high priority properties", I think it would make sense to delete the final category of "DEQ JSCS Program" sites. The DEQ JSCS Program list is a living document that will likely experience routine changes based on the latest DEQ/upland PRP negotiations. Thanks, Jim.

-----Original Message---From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Thursday, November 30, 2006 6:05 PM
To: Anderson, Nicole; ricka@bes.ci.portland.or.us; aron.borok@EILTD.net; hope.bruce@deq.state.or.us;
Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; Koehl, Krista;
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Cc: anderson.jim@deq.state.or.us; voster@anchorenv.com
Subject: Updated Stormwater Table

Attached. For further discussion. Please send me any errors, comments or additions.

Note that we added Willamette Cove even though this was not vetted fully earlier today.

Valerie, please email me to let me know you received this. I am not sure emails are getting out.

Thanks, Eric

(See attached file: StormwaterOutfallSummaryRevised113006.xls)